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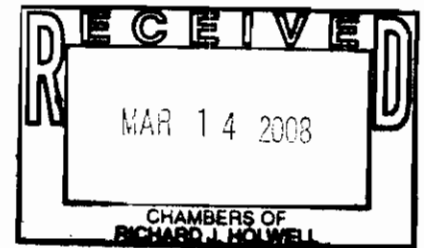
March 14, 2008

BY HAND

Honorable Richard J. Holwell
United States District Judge
United States Courthouse, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Reid-Thomas v. The City of New York et al
07-CV-06477 (RJH)(DF)

Your Honor:



As the Assistant Corporation Counsel assigned to the defense of the above-referenced civil rights matter, I write to respectfully request an enlargement of time from March 28, 2008 until June 13, 2008 to complete fact discovery. Should Your Honor grant this request, defendants further respectfully request that the Court enlarge the corresponding deadlines as set forth in Your Honor's Case Management and Scheduling Order, dated October 28, 2007, for thirty (30) days. Plaintiff's counsel consents to these requests.

To date, the parties have exchanged initial disclosures and responses to initial interrogatories and requests for documents. Additionally, the parties have spent time engaging in meaningful settlement discussions, however, unfortunately an agreement between the parties was unable to be reached.¹ As a result, the parties need to take several depositions and complete discovery. The reason why defendants are requesting a two and a half month enlargement of time is because the undersigned is getting married and will be out of the office April 8, 2008 through April 21, 2008.

Accordingly, it is respectfully requested that the parties' time to complete fact discovery be extended to and including June 13, 2008. Should Your Honor grant this request,

¹ Defendants maintain that a settlement conference would be helpful, however, plaintiff does not agree.

the parties further respectfully request that the Court enlarge the corresponding deadlines as set forth in Your Honor's Case Management and Scheduling Order, dated October 28, 2007, for thirty (30) days.

I thank Your Honor for considering the within requests.

Application Granted
Fact and Expert Discovery
to be completed by 6/13/08
The status conference scheduled
for 5/30/08 is adjourned
to 7/11/08 at 11:00.

Respectfully submitted,

Brooke Birnbaum (BB 8338)
Assistant Corporation Counsel

cc: Mr. David Zelman, Esq. (By Fax)

SO ORDERED

A. J. Whelan

USA ✓

3/20/08